

EXHIBIT B

CAUSE NO. 20-1828-C368

MARY AUGUSTINOVICH,	§	IN THE DISTRICT COURT OF
Plaintiff	§	
	§	
	§	
VS.	§	WILLIAMSON COUNTY, TEXAS
	§	
HOME DEPOT U.S.A., INC.,	§	Williamson County - 368th Judicial District Court
THE HOME DEPOT, INC.	§	
THE HOME DEPOT, and	§	
RICHARD STEINBACH	§	_____ JUDICIAL DISTRICT
Defendants	§	

ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

Mary Augustinovich, Plaintiff, files this original petition against Home Depot U.S.A., Inc., The Home Depot, Inc., The Home Depot, and Richard Steinbach, Defendants, and shows:

1. PARTIES

- 1.1 Mary Augustinovich, (Plaintiff), who resides at 7423 W Hill Ln, Glendale, Arizona 85310, brings this suit. The last four digits of her social security number are redacted for privacy.
- 1.2 **Home Depot U.S.A., Inc.**, is a foreign for-profit corporation at 2455 Paces Ferry Rd Atlanta, Georgia 30339. Defendant Home Depot U.S.A., Inc., is 100 per cent owned by Defendant **The Home Depot, Inc.**, a foreign for-profit corporation at 2455 Paces Ferry Rd Atlanta, Georgia 30339. **The Home Depot** is the common or assumed name under which The Home Depot #6538 (where the incident occurred) operates in Texas at 1303 Rivery Blvd. Georgetown, Texas 78628. Plaintiff sues The Home Depot under its assumed or common name pursuant to Tex. R. Civ. P. 28. **Richard Steinbach** was the store manager on duty the day Plaintiff was injured and is sued in his capacity as store manager.

- 1.3 **Defendant Home Depot U.S.A., Inc.**, can be served through its registered agent for service of process, Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company, 211 E. 7th Street Suite 620, Austin, Texas 78701.
- 1.4 **Defendant The Home Depot, Inc.**, can be served through Defendant Home Depot U.S.A., Inc.'s registered agent for service of process, Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company, 211 E. 7th Street Suite 620, Austin, Texas 78701.
- 1.5 **The Home Depot in its common name** can be served by serving Home Depot U.S.A., Inc., through its registered agent for service of process, Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company, 211 E. 7th Street Suite 620, Austin, Texas 78701.
- 1.6 **Defendant Richard Steinbach**, the store manager on duty the day Plaintiff was injured, can be served with process at The Home Depot #6538 at 1303 Rivery Blvd. Georgetown, Texas 78628.
- 1.7 Issuance of citation and service of process are requested for private process service by Thomas Process for Home Depot U.S.A., Inc.; for The Home Depot, Inc.; for The Home Depot in its common name, and for Richard Steinbach.

2. DISCOVERY CONTROL PLAN

- 2.1 Discovery should be conducted under level 3 pursuant to Tex. Rule Civ. Proc. 190.3.

3. VENUE

- 3.1 Venue is proper in Williamson County, Texas because the incident made the basis of this suit occurred in Williamson County, Texas.

4. FACTS

- 4.1 On November 24, 2018, Mary Augustinovich was with her sister, Kathryn Steinly at The Home Depot, store #6538, located at 1303 Rivery Blvd. Georgetown, Texas 78628. They were shopping for some LED lights in the front of the store and looking at the Black Friday weekend deals.

4.2 Ms. Augustinovich was injured by a display between the aisle endcaps and the cash registers.

The temporary cardboard unit held blister-packs, each containing two heavy-duty flashlights complete with a row of batteries. As Ms. Augustinovich approached, she paused to let another male customer pass by her. He walked by. She passed in front of the display and paused. Ms. Augustinovich heard movement; she turned to look at the display, and saw it falling toward her. She did not have time to get out of the way before the display fell onto her. The display fell against Ms. Augustinovich, hitting her thigh and injuring her left hand, especially at the junction of her thumb and hand.

4.3 A store employee, Stan Green, saw the event, came over to help, and commented that those flashlights are heavy. Ms. Augustinovich immediately reported the incident to the manager on duty, Richard Steinbach and filled out a report in the store before going to an urgent care clinic for treatment.

NEGLIGENCE OF DEFENDANTS

a. Duty

5.1 Defendant Home Depot U.S.A., Inc., is the owner of Home Depot #6538. As the owner of the store, it had a duty to Plaintiff and all invitees to exercise reasonable care in constructing, placing, maintaining all displays and ensuring they are safe for use by Plaintiff and all other invitees. This duty is created by common law.

5.2 Defendant Home Depot U.S.A., Inc., purports in franchise tax filings to be owned 100% by The Home Depot, Inc., and does business under its common name, The Home Depot.

5.3 Defendant Home Depot U.S.A., Inc., was doing business as a home improvement retailer under the common name The Home Depot. Defendants are collectively referred to herein as The Home Depot. Defendants The Home Depot owed a duty to Plaintiff and other invitees to keep them safe from foreseeable hazards and harm and Defendant The Home Depot breached that duty to Plaintiff.

b. Breach of duty

5.4 Defendants The Home Depot failed to exercise ordinary care to protect Plaintiff from hazard by putting up a temporary cardboard display unit, in the aisle and walkway, and stacking heavy items onto the flimsy display. The cardboard display unit was not sufficiently strong or stable enough to hold the products and was top-heavy. The Home Depot failed to make the store conditions reasonably safe by creating a top-heavy, flimsy display that toppled over onto Plaintiff. As an invitee and customer of the store, Plaintiff did not know the danger of the unstable display, nor was the Plaintiff in charge of building the display for products or placing it in a walkway next to customers. Defendants The Home Depot, as the owner, and Defendant Steinbach, as the manager, had the duty to confirm that every display placed in their stores is built strong enough to hold the products on display without having the products or display units fall onto customers such as Plaintiff.

5.5 Defendants The Home Depot and/or its agents, servants, or employees breached their duty to Plaintiff in several regards, generally described as follows:

- a. In setting up feeble, inadequate and improperly built displays in the vicinity of consumers and shoppers.
- b. In failing to warn Plaintiff and other shoppers and consumers of the danger that displays can fall over.
- c. In putting heavy products on weak, improperly built displays, creating unstable top-heavy displays.
- d. In allowing customers to propel shopping carts and flatbed dollies around crowded aisles with temporary, flimsy and unstable end cap displays, increasing the likelihood that displays would become less stable.
- e. In staging the displays in the aisles and in close proximity to shoppers, causing shoppers to come into contact with the displays and increasing the likelihood that the display units and products would fall over and hit customers.
- f. In failing to train management and employees to locate temporary displays out of harm's way.
- g. In failing to train management and employees to create stable display units, properly loaded, within shelf units that are accessible to customers without posing a risk of harm by falling onto them.
- h. In relying upon a system of temporary seasonal displays, in high traffic areas, without due regard for the hazards they present to customers.

5.6 The above acts and omission, individually and in combination, constituted negligence and were proximate causes of Plaintiff's injuries to her body and of her damages.

c. Big Box Business Model

5.7. The big box business model of stacking products on high shelves, and in eye-catching but flimsy temporary end cap displays and dense aisles, creates inherent dangers well known to The Home Depot and other big box warehouse or home improvement stores. These dangers are not known or appreciated by customers until they are injured. With more than 2,200 stores across North America and nearly 400,000 employees, The Home Depot stores average 105,000 square feet loaded with more than one million products.

5.8 The Home Depot features, as part of its business model, temporary seasonal displays with products in cardboard display units which become increasingly unstable with high traffic, rolling carts, shopping baskets, and crowded conditions like Black Friday sales. These temporary displays, set in high traffic areas, put profits over safety.

6. RESPONDEAT SUPERIOR

6.1 At all times referenced herein, all agents, servants and/or employees of Defendant The Home Depot were acting within the course and scope of their employment or official duties and in furtherance of the duties of their employment. Thus, Defendants are responsible for all damages resulting from the negligent acts and/or omissions of its managers, agents, servants and/or employees under the Doctrine of Respondent Superior.

7. INJURIES AND DAMAGES

7.1 As a direct and proximate result of the negligence of defendants, Plaintiff Augustinovich has suffered and sustained personal injuries including a left thumb injury that required multiple surgeries, therapies, immobilizations, as well as abrasions to her right thigh.

7.2 As a further result of the negligence of Defendants, Plaintiff Augustinovich has incurred necessary medical expenses for evaluation and treatment of her injuries. The charges incurred

were the usual and customary charges in the counties in which they were rendered for such services.

7.3 As a result of the negligence of Defendants, Plaintiff Augustinovich will likely need continuing treatment and will necessarily incur reasonable expenses in the future for such medical care.

7.4 As a result of being hit by falling merchandise, Plaintiff Augustinovich will endure in the future, physical pain and mental suffering as a result of her injuries.

7.5 As a result of being hit by falling merchandise, Plaintiff Augustinovich has suffered physical impairment, including the loss of enjoyment of life. Plaintiff Augustinovich will suffer future physical impairment as a result of these injuries.

7.6 As a result of her injuries, Plaintiff Augustinovich has suffered disfigurement and permanent scarring.

7.7 As a result of being hit by falling merchandise, Plaintiff Augustinovich has suffered and will likely suffer in the future from actual lost earnings and lost earning capacity as a result of her injuries.

7.8 As a result of her injuries from the falling merchandise, Plaintiff's damages are in excess of the minimum jurisdictional limits of this Court. The amounts of damages will be according to proof at trial and are not fully known at this time and are within the reasonable discretion of the jury, however, as required by Texas Rule of Civil Procedure 47, Plaintiff states that she seeks monetary relief in excess of \$250,000, but not more than \$1,000,000, based on information currently known to Plaintiff.

8. REQUEST FOR DISCLOSURE

8.1 Under the authority of Texas Rule of Civil Procedure 194, Plaintiff requests that each Defendant disclose within fifty (50) days of service to their Answer all of the information or material described in Texas Rule of Civil Procedure 194.2(a) through (l).

9. HEADINGS

9.1 Headings are for convenience and are not intended to be limiting.

10. PRAYER

10.1 WHEREFORE, Plaintiff requests that each Defendant be cited to appear and answer, and that on final trial Plaintiff be entitled to:

- a. Judgment against Defendants in a sum in excess of the minimum jurisdictional limits of the Court for each of the Plaintiff's past and future damages;
- b. Prejudgment interest;
- c. Postjudgment interest;
- d. Cost of suit; and
- e. All such other relief, at law or at equity, to which Plaintiff may show herself to be entitled.

Respectfully Submitted,



KOSTURA & PUTMAN, P.C.

ATTORNEYS AT LAW

THE COMMISSIONERS HOUSE AT HERITAGE SQUARE

2901 Bee Cave Road, Suite L

Austin, Texas 78746

Telephone: (512) 328-9099

Facsimile No. (512) 328-4132

ATTORNEYS FOR PLAINTIFF

By: _____

JUDY KOSTURA

State Bar No. 11692200

Email: jkostura@jkplaw.com

WILLIAMSON COUNTY LOCAL RULES

C. PRE-TRIAL PROCEDURES

C-2 SCHEDULING. At the time of filing in each non-family civil case, the Clerk will provide the plaintiff a copy of the following rules relating to pre-trial scheduling to be served with the petition. They are as follows:

- a) Any additional parties to be joined within 90 days from the date answered filed.
- b) Plaintiff's expert witnesses to be designated within 120 days from the date answer is filed. Defendant's expert witnesses shall be designated within 150 days from the date answer is filed.
- c) Discovery shall be completed within 180 days from the date answer is filed.
- d) Motions for summary judgment to be filed within 210 days from the date answer is filed.
- e) A settlement conference must be held with the two parties present within 250 days from the date of answer.
- f) A pre-trial statement setting forth unresolved issues, proposed jury charges, and stipulations and all matters to be considered in Rule 166 pre-trial conference shall be filed no later than 270 days from the date of answer. If the parties are unable to agree on a joint pre-trial statement then separate submission is required.

***NOTE** A copy of this rule will be attached to citations issued by the Clerk.

CITATION
THE STATE OF TEXAS, COUNTY OF WILLIAMSON
NO. 20-1828-C368

MARY AUGUSTINOVICH VS. HOME DEPOT U.S.A., INC., THE HOME DEPOT, INC., THE HOME DEPOT AND RICHARD STEINBACH

TO: The Home Depot
 By Serving Its Registered Agent, Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company
 211 E 7th Street
 Ste 620
 Austin TX 78701

DEFENDANT in the above styled and numbered cause:

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment for the relief demanded in the petition may be taken against you.

Attached is a copy of the ORIGINAL PETITION in the above styled and numbered cause, which was filed on the 17th day of November, 2020 in the 368th Judicial District Court of Williamson County, Texas. This instrument describes the claim against you.

ISSUED AND GIVEN UNDER MY HAND AND SEAL of said Court at office on this the 18th day of November, 2020.

ADDRESS OF LEAD ATTORNEY FOR
 PETITIONER:

Judy Kostura
 2901 Bee Cave Road
 Box 1
 Austin TX 78746

Lisa David, District Clerk
 PO Box 24, Georgetown, TX 78627
 Williamson County, Texas
 (512) 943-1212



BY: Stephanie Robles
 Stephanie Robles, Deputy

RETURN OF SERVICE

Came to hand on the ____ day of _____, 20____, at ____ o'clock ____ M. and executed at _____, within the County of _____, Texas, at ____ o'clock ____ M. on the ____ day of _____, 20____, by delivering to the within named _____, in person a true copy of this citation, with a true and correct copy of the ORIGINAL PETITION attached thereto, having first endorsed on such copy of citation the date of delivery.

* **NOT EXECUTED**, the diligence used to execute being (show manner of delivery) _____; for the following reason _____.

the defendant may be found at _____.
 *Strike if not applicable.

TO CERTIFY WHICH WITNESS MY HAND OFFICIALLY _____ COUNTY, TEXAS
 _____ SHERIFF/CONSTABLE BY: _____ DEPUTY

FEE FOR SERVICE OF CITATION : \$ _____

COMPLETE IF YOU ARE A PERSON OTHER THAN A SHERIFF, CONSTABLE, OR CLERK OF THE COURT.

In accordance with Rule 107: The officer or authorized person who serves, or attempts to serve, a citation shall sign the return.

My name is _____, my date of birth is _____, and my address is _____
 Please print. (First, Middle, Last) (Street, City, Zip).

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in _____ County, State of _____, on the _____ day of _____, 20____.

Declarant/Authorized Process Server

ID # & expiration of certification

CITATION
THE STATE OF TEXAS, COUNTY OF WILLIAMSON
NO. 20-1828-C368

MARY AUGUSTINOVICH VS. HOME DEPOT U.S.A., INC., THE HOME DEPOT, INC., THE HOME DEPOT AND RICHARD STEINBACH

TO: The Home Depot, Inc.
 By Serving Its Registered Agent, Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company
 211 E 7th Street Suite 620
 Austin TX 78701

DEFENDANT in the above styled and numbered cause:

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment for the relief demanded in the petition may be taken against you.

Attached is a copy of the ORIGINAL PETITION in the above styled and numbered cause, which was filed on the 17th day of November, 2020 in the 368th Judicial District Court of Williamson County, Texas. This instrument describes the claim against you.

ISSUED AND GIVEN UNDER MY HAND AND SEAL of said Court at office on this the 18th day of November, 2020.

ADDRESS OF LEAD ATTORNEY FOR
 PETITIONER:

Judy Kostura
 2901 Bee Cave Road
 Box 1
 Austin TX 78746

Lisa David, District Clerk
 PO Box 24, Georgetown, TX 78627
 Williamson County, Texas
 (512) 943-1212



BY: Stephanie Robles
 Stephanie Robles, Deputy

RETURN OF SERVICE

Came to hand on the ____ day of _____, 20____, at _____ o'clock ____ M. and executed at _____, within the County of _____, Texas, at _____ o'clock ____ M. on the ____ day of _____, 20____, by delivering to the within named _____, in person a true copy of this citation, with a true and correct copy of the ORIGINAL PETITION attached thereto, having first endorsed on such copy of citation the date of delivery.

* **NOT EXECUTED**, the diligence used to execute being (show manner of delivery) _____; for the following reason _____,

the defendant may be found at _____.
 *Strike if not applicable.

TO CERTIFY WHICH WITNESS MY HAND OFFICIALLY _____ COUNTY, TEXAS
 _____ SHERIFF/CONSTABLE BY: _____ DEPUTY

FEE FOR SERVICE OF CITATION : \$ _____

COMPLETE IF YOU ARE A PERSON OTHER THAN A SHERIFF, CONSTABLE, OR CLERK OF THE COURT.

In accordance with Rule 107: The officer or authorized person who serves, or attempts to serve, a citation shall sign the return.

My name is _____, my date of birth is _____, and my address is _____
 Please print. (First, Middle, Last) _____ (Street, City, Zip).

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in _____ County, State of _____, on the _____ day of _____, 20____.

Declarant/Authorized Process Server

ID # & expiration of certification

CITATION
THE STATE OF TEXAS, COUNTY OF WILLIAMSON
NO. 20-1828-C368

MARY AUGUSTINOVICH VS. HOME DEPOT U.S.A., INC., THE HOME DEPOT, INC., THE HOME DEPOT AND RICHARD STEINBACH

TO: Home Depot U.S.A., Inc.
 By Serving Its Registered Agent, Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company
 211 E 7th Street
 Suite 620
 Austin TX 78701

DEFENDANT in the above styled and numbered cause:

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment for the relief demanded in the petition may be taken against you.

Attached is a copy of the ORIGINAL PETITION in the above styled and numbered cause, which was filed on the 17th day of November, 2020 in the 368th Judicial District Court of Williamson County, Texas. This instrument describes the claim against you.

ISSUED AND GIVEN UNDER MY HAND AND SEAL of said Court at office on this the 18th day of November, 2020.

ADDRESS OF LEAD ATTORNEY FOR
 PETITIONER:

Judy Kostura
 2901 Bee Cave Road
 Box 1
 Austin TX 78746

Lisa David, District Clerk
 PO Box 24, Georgetown, TX 78627
 Williamson County, Texas
 (512) 943-1212



BY: Stephanie Robles
 Stephanie Robles, Deputy

RETURN OF SERVICE

Came to hand on the ____ day of _____, 20____, at ____ o'clock ____ M. and executed at _____, within the County of _____, Texas, at ____ o'clock ____ M. on the ____ day of _____, 20____, by delivering to the within named _____, in person a true copy of this citation, with a true and correct copy of the ORIGINAL PETITION attached thereto, having first endorsed on such copy of citation the date of delivery.

* **NOT EXECUTED**, the diligence used to execute being (show manner of delivery) _____; for the following reason _____.

the defendant may be found at _____.
 *Strike if not applicable.

TO CERTIFY WHICH WITNESS MY HAND OFFICIALLY _____ COUNTY, TEXAS
 _____ SHERIFF/CONSTABLE BY: _____ DEPUTY

FEE FOR SERVICE OF CITATION : \$ _____

COMPLETE IF YOU ARE A PERSON OTHER THAN A SHERIFF, CONSTABLE, OR CLERK OF THE COURT.

In accordance with Rule 107: The officer or authorized person who serves, or attempts to serve, a citation shall sign the return.

My name is _____, my date of birth is _____, and my address is _____
 Please print. (First, Middle, Last) (Street, City, Zip).

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in _____ County, State of _____, on the _____ day of _____, 20____.

Declarant/Authorized Process Server

ID # & expiration of certification

CITATION
THE STATE OF TEXAS, COUNTY OF WILLIAMSON
NO. 20-1828-C368

MARY AUGUSTINOVICH VS. HOME DEPOT U.S.A., INC., THE HOME DEPOT, INC., THE HOME DEPOT AND RICHARD STEINBACH

TO: Richard Steinbach
The Home Depot #6538
1303 Rivery Blvd
Georgetown TX 78628

DEFENDANT in the above styled and numbered cause:

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment for the relief demanded in the petition may be taken against you.

Attached is a copy of the ORIGINAL PETITION in the above styled and numbered cause, which was filed on the 17th day of November, 2020 in the 368th Judicial District Court of Williamson County, Texas. This instrument describes the claim against you.

ISSUED AND GIVEN UNDER MY HAND AND SEAL of said Court at office on this the 18th day of November, 2020.

ADDRESS OF LEAD ATTORNEY FOR
PETITIONER:

Judy Kostura
2901 Bee Cave Road
Box 1
Austin TX 78746

Lisa David, District Clerk
PO Box 24, Georgetown, TX 78627
Williamson County, Texas
(512) 943-1212



BY: Stephanie Robles
Stephanie Robles, Deputy

RETURN OF SERVICE

Came to hand on the ____ day of _____, 20____, at _____ o'clock ____ M. and executed at _____, within the County of _____, Texas, at _____ o'clock ____ M. on the ____ day of _____, 20____, by delivering to the within named _____, in person a true copy of this citation, with a true and correct copy of the ORIGINAL PETITION attached thereto, having first endorsed on such copy of citation the date of delivery.

* **NOT EXECUTED**, the diligence used to execute being (show manner of delivery) _____; for the following reason _____,

the defendant may be found at _____.
*Strike if not applicable.

TO CERTIFY WHICH WITNESS MY HAND OFFICIALLY _____ COUNTY, TEXAS

SHERIFF/CONSTABLE BY: _____ DEPUTY

FEE FOR SERVICE OF CITATION : \$ _____

COMPLETE IF YOU ARE A PERSON OTHER THAN A SHERIFF, CONSTABLE, OR CLERK OF THE COURT.

In accordance with Rule 107: The officer or authorized person who serves, or attempts to serve, a citation shall sign the return.

My name is _____, my date of birth is _____, and my address is _____
Please print. (First, Middle, Last)

(Street, City, Zip).

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in _____ County, State of _____, on the _____ day of _____, 20____.

Declarant/Authorized Process Server

ID # & expiration of certification

Lisa David, District Clerk
Williamson County, Texas
By: Allen, Shannon

CITATION
THE STATE OF TEXAS, COUNTY OF WILLIAMSON
NO. 20-1828-C368

MARY AUGUSTINOVICH VS. HOME DEPOT U.S.A., INC., THE HOME DEPOT, INC., THE HOME DEPOT AND RICHARD STEINBACH

TO: Home Depot U.S.A., Inc.
By Serving Its Registered Agent, Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company
211 E 7th Street
Suite 620
Austin TX 78701

DEFENDANT in the above styled and numbered cause:

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment for the relief demanded in the petition may be taken against you.

Attached is a copy of the ORIGINAL PETITION in the above styled and numbered cause, which was filed on the 17th day of November, 2020 in the 368th Judicial District Court of Williamson County, Texas. This instrument describes the claim against you.

ISSUED AND GIVEN UNDER MY HAND AND SEAL of said Court at office on this the 18th day of November, 2020.

ADDRESS OF LEAD ATTORNEY FOR
PETITIONER:

Judy Kostura
2901 Bee Cave Road
Box 1
Austin TX 78746

Lisa David, District Clerk

PO Box 24, Georgetown, TX 78627
Williamson County, Texas
(512) 943-1212



BY: *Stephanie Robles*

Stephanie Robles, Deputy

RETURN OF SERVICE

Came to hand on the 18th day of Nov, 2020, at 4:00 o'clock P.M. and executed at _____, within the County of _____, Texas, at _____ o'clock _____ M. on the _____ day of _____, 20____, by delivering to the within named _____, in person a true copy of this citation, with a true and correct copy of the ORIGINAL PETITION attached thereto, having first endorsed on such copy of citation the date of delivery.

* **NOT EXECUTED**, the diligence used to execute being (show manner of delivery) _____

_____ ; for the following reason _____

the defendant may be found at _____

*Strike if not applicable.

TO CERTIFY WHICH WITNESS MY HAND OFFICIALLY _____ COUNTY, TEXAS

SHERIFF/CONSTABLE BY: _____ DEPUTY

FEE FOR SERVICE OF CITATION : \$ _____

COMPLETE IF YOU ARE A PERSON OTHER THAN A SHERIFF, CONSTABLE, OR CLERK OF THE COURT.

In accordance with Rule 107: The officer or authorized person who serves, or attempts to serve, a citation shall sign the return.

My name is _____, my date of birth is _____, and my address is _____
Please print. (First, Middle, Last) (Street, City, Zip).

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in _____ County, State of _____, on the _____ day of _____, 20____.

Declarant/Authorized Process Server

ID # & expiration of certification

**AFFIDAVIT
ATTACHED**

20-1828-C368

AFFIDAVIT OF SERVICE

State of Texas

County of Williamson

368th Judicial District Court

Case Number: 20-1828-C368

Plaintiff:

MARY AUGUSTINOVICH

vs.

Defendant:

HOME DEPOT U.S.A., INC., et al

Received these papers on the 18th day of November, 2020 at 4:00 pm to be served on **HOME DEPOT U.S.A., INC. care of its Registered Agent, CORPORATION SERVICE COMPANY D/B/A CSC – LAWYERS INCORPORATING SERVICE COMPANY, 211 E 7th Street, Suite 620, Austin, Travis County, TX 78701.**

I, Thomas Kroll, being duly sworn, depose and say that on the **19th day of November, 2020 at 9:45 am, I:**

hand delivered to **HOME DEPOT U.S.A., INC.,** a true copy of this **Citation together with Original Petition and Request for Disclosure and Williamson County Local Rules,** by delivering to its Registered Agent, **CORPORATION SERVICE COMPANY D/B/A CSC - LAWYERS INCORPORATING SERVICE COMPANY,** by and through its designated agent, **SAMANTHA GUERRA,** at the address of: **211 E 7th Street, Suite 620, Austin, Travis County, TX 78701,** having first endorsed upon such copy of such process the date of delivery.

I certify that I am approved by the Judicial Branch Certification Commission, Misc. Docket No. 05-9122 under rule 103, 501, and 501.2 of the TRCP to deliver citations and other notices from any District, County and Justice Courts in and for the State of Texas. I am competent to make this oath; I am not less than 18 years of age, I am not a party to the above-referenced cause, I have not been convicted of a felony or a crime of moral turpitude, and I am not interested in the outcome of the above-referenced cause.

Subscribed and Sworn to before me on the 19th day of November, 2020 by the affiant who is personally known to me.



Thomas Kroll
PSC - 3012, Exp. 8/31/2021

Our Job Serial Number: THP-2020006272
Ref: Augustinovich



NOTARY PUBLIC



Copyright © 1992-2020 Database Services, Inc. - Process Server's Toolbox V8.1t



Lisa David, District Clerk
Williamson County, Texas
By: Allen, Shannon

CITATION
THE STATE OF TEXAS, COUNTY OF WILLIAMSON
NO. 20-1828-C368

MARY AUGUSTINOVICH VS. HOME DEPOT U.S.A., INC., THE HOME DEPOT, INC., THE HOME DEPOT AND RICHARD STEINBACH

TO: Richard Steinbach
The Home Depot #6538
1303 Rivery Blvd
Georgetown TX 78628

DEFENDANT in the above styled and numbered cause:

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment for the relief demanded in the petition may be taken against you.

Attached is a copy of the ORIGINAL PETITION in the above styled and numbered cause, which was filed on the 17th day of November, 2020 in the 368th Judicial District Court of Williamson County, Texas. This instrument describes the claim against you.

ISSUED AND GIVEN UNDER MY HAND AND SEAL of said Court at office on this the 18th day of November, 2020.

ADDRESS OF LEAD ATTORNEY FOR
PETITIONER:
Judy Kostura
2901 Bee Cave Road
Box 1
Austin TX 78746

Lisa David, District Clerk
PO Box 24, Georgetown, TX 78627
Williamson County, Texas
(512) 943-1212



BY: *Stephanie Robles*
Stephanie Robles, Deputy

RETURN OF SERVICE

Came to hand on the 18th day of Nov, 2020, at 4:00 o'clock PM. and executed at _____, within the County of _____, Texas, at _____ o'clock _____ M. on the _____ day of _____, 20____, by delivering to the within named _____, in person a true copy of this citation, with a true and correct copy of the ORIGINAL PETITION attached thereto, having first endorsed on such copy of citation the date of delivery.

* **NOT EXECUTED**, the diligence used to execute being (show manner of delivery) _____

_____ ; for the following reason _____

the defendant may be found at _____

*Strike if not applicable.

TO CERTIFY WHICH WITNESS MY HAND OFFICIALLY _____ COUNTY, TEXAS
_____, SHERIFF/CONSTABLE BY: _____ DEPUTY

FEE FOR SERVICE OF CITATION : \$ _____

COMPLETE IF YOU ARE A PERSON OTHER THAN A SHERIFF, CONSTABLE, OR CLERK OF THE COURT.

In accordance with Rule 107: The officer or authorized person who serves, or attempts to serve, a citation shall sign the return.

My name is _____, my date of birth is _____, and my address is _____
Please print. (First, Middle, Last) _____ (Street, City, Zip).

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in _____ County, State of _____, on the _____ day of _____, 20____.

Declarant/Authorized Process Server

ID # & expiration of certification

20-1828-C368

AFFIDAVIT OF SERVICE

State of Texas

County of Williamson

368th Judicial District Court

Case Number: 20-1828-C368

Plaintiff:

MARY AUGUSTINOVICH

vs.

Defendant:

HOME DEPOT U.S.A., INC., et al


Received these papers on the 18th day of November, 2020 at 4:00 pm to be served on **RICHARD STEINBACH At The Home Depot #6538, 1303 Rivery Blvd, Georgetown, Williamson County, TX 78628.**

I, Emmanuel Morales, being duly sworn, depose and say that on the **19th day of November, 2020 at 2:03 pm, I:**

delivered in hand, a true copy of the **Citation together with Original Petition and Request for Disclosure and Williamson County Local Rules** with the date of service endorsed thereon by me, to: **RICHARD STEINBACH At The Home Depot #6538** at the address of: **1303 Rivery Blvd, Georgetown, Williamson County, TX 78628**, and informed said person of the contents therein, in compliance with state statutes.

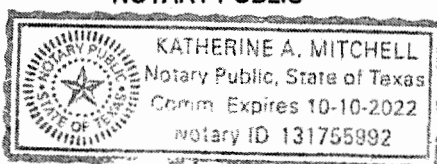
I certify that I am approved by the Judicial Branch Certification Commission, Misc. Docket No. 05-9122 under rule 103, 501, and 501.2 of the TRCP to deliver citations and other notices from any District, County and Justice Courts in and for the State of Texas. I am competent to make this oath; I am not less than 18 years of age, I am not a party to the above-referenced cause, I have not been convicted of a felony or a crime of moral turpitude, and I am not interested in the outcome of the above-referenced cause.

Subscribed and Sworn to before me on the 19th day of November, 2020 by the affiant who is personally known to me.


Emmanuel Morales
PSC - 10708, Exp. 12/31/2021


NOTARY PUBLIC

Our Job Serial Number: THP-202006275
Ref: Augustinovich



Copyright © 1992-2020 Database Services, Inc. - Process Server's Toolbox V8 11



Lisa David, District Clerk
Williamson County, Texas
By: Allen, Shannon

CITATION
THE STATE OF TEXAS, COUNTY OF WILLIAMSON
NO. 20-1828-C368

MARY AUGUSTINOVICH VS. HOME DEPOT U.S.A., INC., THE HOME DEPOT, INC., THE HOME DEPOT AND RICHARD STEINBACH

TO: The Home Depot, Inc.
By Serving Its Registered Agent, Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company
211 E 7th Street Suite 620
Austin TX 78701

DEFENDANT in the above styled and numbered cause:

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment for the relief demanded in the petition may be taken against you.

Attached is a copy of the ORIGINAL PETITION in the above styled and numbered cause, which was filed on the 17th day of November, 2020 in the 368th Judicial District Court of Williamson County, Texas. This instrument describes the claim against you.

ISSUED AND GIVEN UNDER MY HAND AND SEAL of said Court at office on this the 18th day of November, 2020.

ADDRESS OF LEAD ATTORNEY FOR
PETITIONER:
Judy Kostura
2901 Bee Cave Road
Box 1
Austin TX 78746

Lisa David, District Clerk
PO Box 24, Georgetown, TX 78627
Williamson County, Texas
(512) 943-1212



BY: Stephanie Robles

Stephanie Robles, Deputy

RETURN OF SERVICE

Came to hand on the 18th day of Nov, 2020, at 4:00 o'clock PM. and executed at _____, within the County of _____, Texas, at _____ o'clock _____ M. on the _____ day of _____, 20____, by delivering to the within named _____, in person a true copy of this citation, with a true and correct copy of the ORIGINAL PETITION attached thereto, having first endorsed on such copy of citation the date of delivery.

* **NOT EXECUTED**, the diligence used to execute being (show manner of delivery) _____; for the following reason _____

the defendant may be found at _____

*Strike if not applicable.

TO CERTIFY WHICH WITNESS MY HAND OFFICIALLY _____ COUNTY, TEXAS

SHERIFF/CONSTABLE BY: _____ DEPUTY

FEE FOR SERVICE OF CITATION : \$ _____

COMPLETE IF YOU ARE A PERSON OTHER THAN A SHERIFF, CONSTABLE, OR CLERK OF THE COURT.

In accordance with Rule 107: The officer or authorized person who serves, or attempts to serve, a citation shall sign the return.

My name is _____, my date of birth is _____, and my address is _____
Please print. (First, Middle, Last)

(Street, City, Zip).

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in _____ County, State of _____, on the _____ day of _____, 20____.

Declarant/Authorized Process Server

ID # & expiration of certification

**AFFIDAVIT
ATTACHED**

20-1828-C368

AFFIDAVIT OF SERVICE

State of Texas

County of Williamson

368th Judicial District Court

Case Number: 20-1828-C368

Plaintiff:

MARY AUGUSTINOVICH

vs.

Defendant:

HOME DEPOT U.S.A., INC., et al

Received these papers on the 18th day of November, 2020 at 4:00 pm to be served on **THE HOME DEPOT, INC. care of its Registered Agent, CORPORATION SERVICE COMPANY D/B/A CSC – LAWYERS INCORPORATING SERVICE COMPANY, 211 E 7th Street, Suite 620, Austin, Travis County, TX 78701.**

I, Thomas Kroll, being duly sworn, depose and say that on the **19th day of November, 2020 at 9:45 am, I:**

hand delivered to **THE HOME DEPOT, INC.,** a true copy of this **Citation together with Original Petition and Request for Disclosure and Williamson County Local Rules,** by delivering to its Registered Agent, **CORPORATION SERVICE COMPANY D/B/A CSC - LAWYERS INCORPORATING SERVICE COMPANY,** by and through its designated agent, **SAMANTHA GUERRA,** at the address of: **211 E 7th Street, Suite 620, Austin, Travis County, TX 78701,** having first endorsed upon such copy of such process the date of delivery.

I certify that I am approved by the Judicial Branch Certification Commission, Misc. Docket No. 05-9122 under rule 103, 501, and 501.2 of the TRCP to deliver citations and other notices from any District, County and Justice Courts in and for the State of Texas. I am competent to make this oath; I am not less than 18 years of age, I am not a party to the above-referenced cause, I have not been convicted of a felony or a crime of moral turpitude, and I am not interested in the outcome of the above-referenced cause.

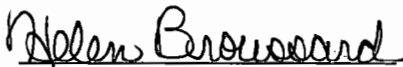
Subscribed and Sworn to before me on the 19th day of November, 2020 by the affiant who is personally known to me.



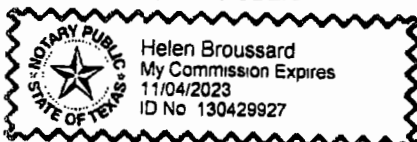
Thomas Kroll

PSC - 3012, Exp. 8/31/2021

Our Job Serial Number: THP-2020006273
Ref: Augustinovich



NOTARY PUBLIC



Copyright © 1992-2020 Database Services, Inc. - Process Server's Toolbox V8.1t



Lisa David, District Clerk
Williamson County, Texas
By: Allen, Shannon

CITATION
THE STATE OF TEXAS, COUNTY OF WILLIAMSON
NO. 20-1828-C368

MARY AUGUSTINOVICH VS. HOME DEPOT U.S.A., INC., THE HOME DEPOT, INC., THE HOME DEPOT AND RICHARD STEINBACH

TO: The Home Depot
By Serving Its Registered Agent, Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company
211 E 7th Street
Ste 620
Austin TX 78701

DEFENDANT in the above styled and numbered cause:

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment for the relief demanded in the petition may be taken against you.

Attached is a copy of the ORIGINAL PETITION in the above styled and numbered cause, which was filed on the 17th day of November, 2020 in the 368th Judicial District Court of Williamson County, Texas. This instrument describes the claim against you.

ISSUED AND GIVEN UNDER MY HAND AND SEAL of said Court at office on this the 18th day of November, 2020.

ADDRESS OF LEAD ATTORNEY FOR
PETITIONER:

Judy Kostura
2901 Bee Cave Road
Box 1
Austin TX 78746

Lisa David, District Clerk
PO Box 24, Georgetown, TX 78627
Williamson County, Texas
(512) 943-1212



BY: Stephanie Robles

Stephanie Robles, Deputy

RETURN OF SERVICE

Came to hand on the 18th day of Nov, 2020, at 4⁰⁰ o'clock P.M. and executed at _____, within the County of _____, Texas, at _____ o'clock _____ M. on the _____ day of _____, 20____, by delivering to the within named _____, in person a true copy of this citation, with a true and correct copy of the ORIGINAL PETITION attached thereto, having first endorsed on such copy of citation the date of delivery.

* **NOT EXECUTED**, the diligence used to execute being (show manner of delivery) _____

_____ ; for the following reason _____

the defendant may be found at _____

*Strike if not applicable.

TO CERTIFY WHICH WITNESS MY HAND OFFICIALLY _____ COUNTY, TEXAS
_____ SHERIFF/CONSTABLE BY: _____ DEPUTY

FEE FOR SERVICE OF CITATION : \$ _____

COMPLETE IF YOU ARE A PERSON OTHER THAN A SHERIFF, CONSTABLE, OR CLERK OF THE COURT.

In accordance with Rule 107: The officer or authorized person who serves, or attempts to serve, a citation shall sign the return.

My name is _____, my date of birth is _____, and my address is _____
Please print. (First, Middle, Last) (Street, City, Zip).

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in _____ County, State of _____, on the _____ day of _____, 20____.

Declarant/Authorized Process Server

ID # & expiration of certification

**AFFIDAVIT
ATTACHED**

20-1828-C368

AFFIDAVIT OF SERVICE

State of Texas

County of Williamson

368th Judicial District Court

Case Number: 20-1828-C368

Plaintiff:

MARY AUGUSTINOVICH

vs.

Defendant:

HOME DEPOT U.S.A., INC., et al

Received these papers on the 18th day of November, 2020 at 4:00 pm to be served on **THE HOME DEPOT care of its Registered Agent, CORPORATION SERVICE COMPANY D/B/A CSC – LAWYERS INCORPORATING SERVICE COMPANY, 211 E 7th Street, Suite 620, Austin, Travis County, TX 78701.**

I, Thomas Kroll, being duly sworn, depose and say that on the **19th day of November, 2020 at 9:45 am, I:**

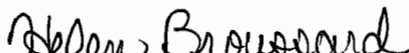
hand delivered to **THE HOME DEPOT**, a true copy of this **Citation together with Original Petition and Request for Disclosure and Williamson County Local Rules**, by delivering to its Registered Agent, **CORPORATION SERVICE COMPANY D/B/A CSC - LAWYERS INCORPORATING SERVICE COMPANY**, by and through its designated agent, **SAMANTHA GUERRA**, at the address of: **211 E 7th Street, Suite 620, Austin, Travis County, TX 78701**, having first endorsed upon such copy of such process the date of delivery.

I certify that I am approved by the Judicial Branch Certification Commission, Misc. Docket No. 05-9122 under rule 103, 501, and 501.2 of the TRCP to deliver citations and other notices from any District, County and Justice Courts in and for the State of Texas. I am competent to make this oath; I am not less than 18 years of age, I am not a party to the above-referenced cause, I have not been convicted of a felony or a crime of moral turpitude, and I am not interested in the outcome of the above-referenced cause.

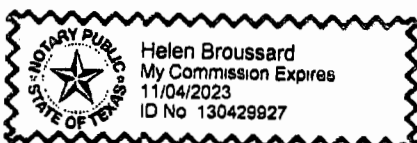
Subscribed and Sworn to before me on the 19th day of November, 2020 by the affiant who is personally known to me.



Thomas Kroll
PSC - 3012, Exp. 8/31/2021


NOTARY PUBLIC

Our Job Serial Number: THP-2020006274
Ref: Augustinovich



Copyright © 1992-2020 Database Services, Inc. - Process Server's Toolbox V8.1t



CAUSE NO. 20-1828-C368

MARY AUGUSTINOVICH,	§	IN THE DISTRICT COURT
	§	
Plaintiff,	§	
	§	
vs.	§	368 TH JUDICIAL DISTRICT
	§	
	§	
HOME DEPOT U.S.A., INC.,	§	
THE HOME DEPOT, INC.,	§	
THE HOME DEPOT, and	§	
RICHARD STEINBACH,	§	
	§	
Defendants.	§	WILLIAMSON COUNTY, TEXAS

**DEFENDANT HOME DEPOT U.S.A.'S AND THE HOME DEPOT, INC.'S AND
 RICHARD STEINBACH'S ORIGINAL ANSWERS AND SPECIAL EXCEPTIONS TO
 PLAINTIFF'S ORIGINAL PETITION**

TO THE HONORABLE JUDGE:

COME NOW Home Depot U.S.A., Inc., sued also under its trade or common name "The Home Depot," The Home Depot, Inc., and Richard Steinbach (hereinafter referred to as "Defendants"), Defendants in the above-entitled and numbered cause, and for their Original Answer and Special Exceptions to Plaintiff's Original Petition would respectfully show unto the Court as follows:

SPECIAL EXCEPTIONS

I.

Defendants specially except to paragraph 7 of the Petition wherein Plaintiff seeks recovery for unspecified medical expenses and lost wages/loss of earning capacity and, pursuant to TEX. R. CIV. P. 56, requests that Plaintiff be required to itemize all special damages for which she seeks recovery. Of which special exception, Defendants pray judgment of the Court.

II.

Defendants further specially except to the prayer for relief of the Petition wherein it is alleged that Plaintiff seeks recovery “for all such other and further relief to which Plaintiff may show herself to be justly entitled.” Defendants are entitled to know the specific types of relief to which the Plaintiff may be entitled at law or in equity; accordingly, this global claim for relief should be stricken or, in the alternative, Plaintiff should be required to re-plead to specifically identify each type of damage for which she seeks recovery. Of which special exception, Defendants pray judgment of the Court.

ORIGINAL ANSWER

III.

Pursuant to Rule 92 of the Texas Rules of Civil Procedure, Defendants hereby enter a general denial and demand that Plaintiff be required to prove her allegations by a preponderance of the evidence.

IV.

Pleading further, Defendants affirmatively allege that Plaintiff’s own negligence was the sole proximate cause or, alternatively, a proximate cause of the incident made the basis of this suit and Plaintiff’s damages, if any.

V.

Pleading further, in the unlikely event that any Defendant is found at fault, the amount recovered for past medical or health care expenses incurred by Plaintiff is limited by Section 41.0105 of the Texas Civil Practice and Remedies Code.

VI.

Pleading further, Defendants affirmatively allege that the incident made the basis of this suit and Plaintiff’s damages, if any, were proximately caused by the negligence of third parties over whom

Defendants had no control or right of control (including Duracell and the unknown customer who Plaintiff impliedly admits to have knocked over the display).

WHEREFORE, PREMISES CONSIDERED, Defendants pray that Plaintiff take nothing by this action and that Defendants be dismissed with their costs, and for such other relief, both general and specific, at law or in equity, to which Defendants may be justly entitled.

Respectfully submitted,

LAW OFFICES OF ARTHUR K. SMITH,
a Professional Corporation

By: /s/ Arthur K. Smith
Arthur K. Smith
State Bar No. 18534100

507 Prestige Circle
Allen, Texas 75002
Telephone: (469) 519-2500
Facsimile: (469) 519-2555
Email: asmith@aksmithlaw.com

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that the foregoing document was filed via the Court's electronic filing system and thus served on all counsel of record on this 11th day of December, 2020.

/s/ Arthur K. Smith
Arthur K. Smith

AnswerforHDUSA

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Arthur Smith on behalf of Arthur Smith
Bar No. 18534100
lchamberlain@aksmithlaw.com
Envelope ID: 48860818
Status as of 12/11/2020 10:14 AM CST

Associated Case Party: Mary Augustinovich

Name	BarNumber	Email	TimestampSubmitted	Status
Judy AKostura		jkostura@jkplaw.com	12/11/2020 9:52:11 AM	SENT

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Jennie Archer		jarcher@jkplaw.com	12/11/2020 9:52:11 AM	SENT

CAUSE NO. 20-1828-C368

MARY AUGUSTINOVICH	§	IN THE DISTRICT COURT OF
	§	
VS.	§	WILLIAMSON COUNTY, TEXAS
	§	
HOME DEPOT U.S.A., INC.,	§	
THE HOME DEPOT, INC.,	§	
THE HOME DEPOT AND	§	
RICHARD STEINBACH	§	368TH JUDICIAL DISTRICT

NOTICE OF APPEARANCE OF RETAINED CO-COUNSEL
FOR DEFENDANT HOME DEPOT USA, INC.

TO THE HONORABLE JUDGE OF SAID COURT:

Now comes the undersigned attorneys and files this Notice of Appearance as retained counsel for Defendants Home Depot U.S.A., Inc. and Richard Steinbach in the above-styled and numbered cause in accordance with Rule 8 of the Texas Rules of Civil Procedure. All communications from the court or other counsel with respect to this suit shall be sent to the undersigned, as well as co-counsel of record for Defendant.

Respectfully submitted,

HAWKINS PARNELL & YOUNG, LLP

By: /s/Amy Welborn

AMY C. WELBORN

State Bar No. 24012853

awelborn@hpylaw.com

TROY D. HELLING

State Bar No. 24007340

thelling@hpylaw.com

2705 Bee Caves Road, Suite 220

Austin, Texas 78746

(512) 687-6900

(512) 687-6990 (Fax)

ATTORNEYS FOR DEFENDANTS

HOME DEPOT U.S.A., INC. AND

RICHARD STEINBACH

CERTIFICATE OF SERVICE

I hereby certify by my signature above that a true and correct copy of the foregoing document has been sent via electronic service to counsel of record in accordance with the Texas Rules of Civil Procedure, on this the 17th day of December, 2020.

Kostura & Putman, P.C.
Judy Kostura
jkostura@jkplaw.com
2901 Bee Cave Road, Suite L
Austin, Texas 78746